

1
2 Michael Kind, Esq.
3 Nevada Bar No.: 13903
4 **KIND LAW**
5 8860 South Maryland Parkway, Suite 106
6 Las Vegas, Nevada 89123
7 (702) 337-2322
8 (702) 329-5881 (fax)
9 mk@kindlaw.com

10
11 Matthew M. Loker, Esq.
12 *Admitted Pro Hac Vice*
13 **LOKER LAW, APC**
14 1303 East Grand Avenue, Suite 101
15 Arroyo Grande, CA 93420
16 (805) 994-0177
17 matt@loker.law
18 *Attorney for Plaintiff Angela Bangert*

19
20
21
22
23
24
25
26
27
UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

18
19
20
21
22
23
24
25
26
27
Angela Bangert,

v.
SoFi Bank N.A., et al.

Defendants.

Case No.: 2:22-cv-01418-RFB-BNW

**Stipulated Discovery Plan and
Scheduling Order Submitted in
Compliance with LR 26-1(b)**

1 Plaintiff Angela Bangert and Defendant SoFi Bank, N.A.¹ (jointly as the
 2 "parties"), by and through their respective counsel, hereby submit this proposed
 3 Joint Discovery Plan and Scheduling Order. The parties will request 180 days of
 4 discovery as noted below.

5 **PROPOSED DISCOVERY PLAN**

6 The parties propose the following discovery plan and scheduling order:

Initial Disclosures	August 10, 2023
Amend Pleadings and Add Parties	September 10, 2023
Expert Disclosures (Initial)	November 10, 2023
Expert Disclosures (Rebuttal)	December 8, 2023
Discovery Cutoff	January 7, 2024
Dispositive Motions	February 23, 2024
Pretrial Order	May 7, 2024

17 In the event that dispositive motions are filed, the date for filing the joint
 18 pretrial order shall be suspended until 30 days after decision on the dispositive
 19 motions or until further order of the court.

20
 21 Pretrial Disclosures: The disclosures required by Rule 26(a)(3), and any
 22 objections thereto, shall be included in the joint pretrial order.

23 Extensions or Modifications of the Discovery Plan and Scheduling Order:
 24 Applications to extend any date set by the discovery plan, scheduling order, or other
 25 order must comply with the Local Rules.

26
 27 ¹ Bangert has resolved her claims against Defendants Experian Information
 Solutions, Inc.; and, Equifax Information Services, LLC.

1 Protective Order: The parties may seek to enter a stipulated protective order
2 pursuant to Rule 26(c) prior to producing any confidential documents.

3 Electronic Service: The parties agree that pursuant to Rules 5(b)(2)(E) and
4 6(d) of the Federal Rules of Civil Procedure any pleadings or other papers may be
5 served by sending such documents by email.

6 Alternative Dispute Resolution Certification: The parties certify that they met
7 and conferred about the possibility of using alternative dispute-resolution processes
8 including mediation, arbitration, and early neutral evaluation. The parties have not
9 reached any stipulations at this stage.

10 Alternative Forms of Case Disposition Certification: The parties certify that
11 they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and
12 Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).
13 The parties have not reached any stipulations at this stage.

14 Electronically Stored Information: The parties have discussed the retention
15 and production of electronic data. The parties agree that service of discovery by
16 electronic means, including sending original electronic files by email or on a cd is
17 sufficient. The parties reserve the right to revisit this issue if a dispute or need arises.

18 Electronic evidence conference certification: The parties further intend to
19 present evidence in electronic format to jurors for the purposes of jury deliberations
20 at trial.
21 ///
22 ///
23 ///
24

1 The parties discussed the presentation of evidence for juror deliberations but
2 did not reach any stipulations as to the method at this early stage.

3
4 Dated: July 10, 2023

5 **KIND LAW**

6
7 /s/ Michael Kind
8 Michael Kind, Esq.
9 8860 South Maryland Parkway, Suite 106
Las Vegas, Nevada 89123

10
11 **BALLARD SPAHR LLP**

12
13 /s/ Joel E. Tasca
14 Joel E. Tasca, Esq.
15 Madeleine Coles, Esq.
16 1980 Festival Plaza Drive, Suite 900
17 Las Vegas, Nevada 89135
Counsel for SoFi Bank N.A.

SCHEDULING ORDER

The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for this action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: July 11, 2023

DATED: July 11, 2023